

From: Waite, Oxana
Sent: 26 July 2024 12:13
To: Altman, Rebecca
Subject: RE: Land adjoining 4 Providence Hill - ref. F/24/97312

Hi Rebecca,

Thank you for sharing the Air Quality Report submitted by Hawkins Environmental in support of the

Construction of a Residential Care Community, comprising a 73-bed care home (Use Class C2) and 5 x 2-bedroom close care cottages (Use Class C3 age restricted), with associated access, internal access road, parking, landscaping, and infrastructure, ref. F/24/97312.

The development lays within our Hamble AQMA (3) and there are three EBC monitoring locations near the development.

Overall, the proposed methodology and legislative review appear adequate. However, I have several concerns and observations that need to be addressed:

1. Methodology and Legislative Review:
 - Section 2.9 references the "Use of 2020 and 2021 Monitoring Datasets (2021)" and discusses the impact of the Pandemic, which appears irrelevant to this assessment.
2. Assessment Accuracy:
 - The assessment uses traffic and emissions baseline data from 2019, with counts undertaken in 2024, scaled up by 1.5% to 2026, which appears adequate.
 - Meteorological data from Southampton Airport for 2019 is used, but...
 - In Appendix 3.6 - Background Concentration of Air Pollutants the background concentration data year is unclear. It mentions 14.81 µg/m³ for NO₂ at 1 km² grid square centred at 448500 110500. A cross-reference for the location in 2019 suggests 19.78322 suggesting erroneous location or concentration.
 - The latest LAQM Technical Guidance TG22 published in 2022 should be referenced throughout, instead of the 2016 guidance noted in Appendix 2.
 - The report mentions the 2014 edition of the "Guidance on the Assessment of Dust from Demolition and Construction" when the newer (2023 and 2024) versions 2.1 and 2.2 are available.
 - Section 5.2 references the Environmental Permitting (England and Wales) Regulations 2010, which should be updated to 2016.
3. Emission Factors and Data Use:
 - The report correctly mentions the use of Emissions Factors Toolkit v12 but discusses v11.0 in detail, compromising consistency.
 - It is unclear why 2019 data was used for model verification when more recent data is available through our website [Air quality monitoring | Eastleigh Borough Council](#) & [Diffusion Tube Data | Eastleigh \(my-air.uk\)](#). The communication with the consultancy did not include the request for the monitoring data. The report acknowledges that 2019 data for nearby locations at Providence Hill was incomplete, raising concerns about the accuracy of predicted and modelled concentrations.
4. Predicted Concentrations:
 - Table 7.2: Air Quality Concentrations 2024 – With Development Related Traffic appears to significantly underpredict concentrations. This can be verified against 2024 monitoring data, suggesting the predictions as unreasonable.
5. Construction Phase Management:

- We support the approach to managing the construction phase impact and addressing the residual risk, classified as medium, through the production and verification of a Dust Management Plan (DMP) or Construction Environmental Management Plan (CEMP). This plan “should be approved by the local planning authority prior to commencement of work on site”, following the recommendations of the [2024 \(v2.2\)](#) IAQM Guidance on the assessment of dust from demolition and construction.

Although we look forward to receiving the DMP/CEMP for review and approval as suggested, given the inaccuracies and inconsistencies noted, I have concerns about the overall quality of the presented information and question the report's conclusions.

Kind regards,

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